

Exhibit A-2

INDEX OF DOCUMENTS FILED WITH STATE COURT

Process, pleadings and orders in the 71st Judicial District Court of Harrison County, Texas

<u>TAB</u>	<u>DATE</u>	<u>DESCRIPTION</u>
1.	04/17/2017	Civil case information sheet
2.	04/17/2017	Letter to clerk requesting issuance of citation
3.	04/17/2017	Civil Process Request Form
4.	04/17/2017	Plaintiffs' Original Petition
5.	04/18/2017	Citation to Schiff Hardin, LLP
6.	04/26/2017	Affidavit of Service to Schiff Hardin, LLP

Filed 4/17/2017 5 06 49 PM

Sherry Griffiths

District Clerk

Harrison County, Texas

CIVIL CASE INFORMATION SHEET 17-0326

CAUSE NUMBER (FOR CLERK USE ONLY):

COURT (FOR CLERK USE ONLY):

Angie Hayes

STYLED Ironshore Europe DAC vs Schiff Hardin, LLP

Deputy

(e.g., John Smith v. All American Insurance Co., In re Mary Ann Jones; In the Matter of the Estate of George Jackson)

A civil case information sheet must be completed and submitted when an original petition or application is filed to initiate a new civil, family law, probate, or mental health case or when a post-judgment petition for modification or motion for enforcement is filed in a family law case. The information should be the best available at the time of filing.

1. Contact information for person completing case information sheet:		Names of parties in case.		Person or entity completing sheet is:	
Name	Email	Plaintiff(s)/Petitioner(s)	<input checked="" type="checkbox"/> Attorney for Plaintiff/Petitioner <input type="checkbox"/> Pro Se Plaintiff/Petitioner <input type="checkbox"/> Title IV-D Agency <input type="checkbox"/> Other		
Jeffrey R. Parsons	jparsons@pmmclaw.com	Ironshore Europe DAC			
Address	Telephone	Defendant(s)/Respondent(s)	Additional Parties in Child Support Case		
One Riverway, Ste 1800	713-960-7315	Schiff Hardin LLP	Custodial Parent		
City/State/Zip	Fax		Non-Custodial Parent		
Houston, TX 77056	713-960-7347		Presumed Father		
Signature	State Bar No	[Attach additional page as necessary to list all parties]			
<i>Jeffrey R. Parsons</i>	15547200				
2. Indicate case type, or identify the most important issue in the case (select only 1):					
Civil			Family Law		
Contract	Injury or Damage	Real Property	Marriage Relationship	Post-judgment Actions (non-Title IV-D)	
Debt/Contract <input type="checkbox"/> Consumer/DTPA <input type="checkbox"/> Debt/Contract <input type="checkbox"/> Fraud/Misrepresentation <input type="checkbox"/> Other Debt/Contract Foreclosure <input type="checkbox"/> Home Equity—Expedited <input type="checkbox"/> Other Foreclosure <input type="checkbox"/> Franchise <input type="checkbox"/> Insurance <input type="checkbox"/> Landlord/Tenant <input type="checkbox"/> Non-Competition <input type="checkbox"/> Partnership <input type="checkbox"/> Other Contract	<input type="checkbox"/> Assault/Battery <input type="checkbox"/> Construction <input type="checkbox"/> Defamation Malpractice <input type="checkbox"/> Accounting <input type="checkbox"/> Legal <input type="checkbox"/> Medical <input type="checkbox"/> Other Professional Liability <input type="checkbox"/> Motor Vehicle Accident <input type="checkbox"/> Premises Product Liability <input type="checkbox"/> Asbestos/Silica <input type="checkbox"/> Other Product Liability <input type="checkbox"/> Last Product <input checked="" type="checkbox"/> Other Injury or Damage	<input type="checkbox"/> Eminent Domain/Condemnation <input type="checkbox"/> Partition <input type="checkbox"/> Quiet Title <input type="checkbox"/> Trespass to Try Title <input type="checkbox"/> Other Property Related to Criminal Matters <input type="checkbox"/> Expunction <input type="checkbox"/> Judgment Nisi <input type="checkbox"/> Non-Disclosure <input type="checkbox"/> Seizure/Forfeiture <input type="checkbox"/> Writ of Habeas Corpus—Pre-indictment <input type="checkbox"/> Other	<input type="checkbox"/> Annulment <input type="checkbox"/> Declare Marriage Void Divorce <input type="checkbox"/> With Children <input type="checkbox"/> No Children Other Family Law <input type="checkbox"/> Enforce Foreign Judgment <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Name Change <input type="checkbox"/> Protective Order <input type="checkbox"/> Removal of Disabilities of Minority <input type="checkbox"/> Other	<input type="checkbox"/> Enforcement <input type="checkbox"/> Modification—Custody <input type="checkbox"/> Modification—Other Title IV-D <input type="checkbox"/> Enforcement/Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Reciprocals (UIFSA) <input type="checkbox"/> Support Order Parent-Child Relationship <input type="checkbox"/> Adoption/Adoption with Termination <input type="checkbox"/> Child Protection <input type="checkbox"/> Child Support <input type="checkbox"/> Custody or Visitation <input type="checkbox"/> Gestational Parenting <input type="checkbox"/> Grandparent Access <input type="checkbox"/> Parentage/Paternity <input type="checkbox"/> Termination of Parental Rights <input type="checkbox"/> Other Parent-Child	
Employment	Other Civil				
<input type="checkbox"/> Discrimination <input type="checkbox"/> Retaliation <input type="checkbox"/> Termination <input type="checkbox"/> Workers' Compensation <input type="checkbox"/> Other Employment	<input type="checkbox"/> Administrative Appeal <input type="checkbox"/> Antitrust/Unfair Competition <input type="checkbox"/> Code Violations <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Intellectual Property <input type="checkbox"/> Lawyer Discipline <input type="checkbox"/> Perpetuate Testimony <input type="checkbox"/> Securities/Stock <input type="checkbox"/> Tortious Interference <input type="checkbox"/> Other				
Tax	Probate & Mental Health				
<input type="checkbox"/> Tax Appraisal <input type="checkbox"/> Tax Delinquency <input type="checkbox"/> Other Tax	Probate/Wills/Intestate Administration <input type="checkbox"/> Dependent Administration <input type="checkbox"/> Independent Administration <input type="checkbox"/> Other Estate Proceedings <input type="checkbox"/> Guardianship—Adult <input type="checkbox"/> Guardianship—Minor <input type="checkbox"/> Mental Health <input type="checkbox"/> Other				
3. Indicate procedure or remedy, if applicable (may select more than 1):					
<input type="checkbox"/> Appeal from Municipal or Justice Court <input type="checkbox"/> Arbitration-related <input type="checkbox"/> Attachment <input type="checkbox"/> Bill of Review <input type="checkbox"/> Certiorari <input type="checkbox"/> Class Action		<input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Interpleader <input type="checkbox"/> License <input type="checkbox"/> Mandamus <input type="checkbox"/> Post-judgment		<input type="checkbox"/> Prejudgment Remedy <input type="checkbox"/> Protective Order <input type="checkbox"/> Receiver <input type="checkbox"/> Sequestration <input type="checkbox"/> Temporary Restraining Order/Injunction <input type="checkbox"/> Turnover	
4. Indicate damages sought (do not select if it is a family law case):					
<input type="checkbox"/> Less than \$100,000, including damages of any kind, penalties, costs, expenses, pre-judgment interest, and attorney fees <input type="checkbox"/> Less than \$100,000 and non monetary relief <input type="checkbox"/> Over \$100,000 but not more than \$200,000 <input type="checkbox"/> Over \$200,000 but not more than \$1,000,000 <input checked="" type="checkbox"/> Over \$1,000,000					

Rev 2/13

Filed 4/17/2017 5:06:49 PM
Sherry Griffis
District Clerk
Harrison County, Texas

17-0326

Angie Hayes

Deputy

Parsons McEntire McCleary & Clark PLLC

One Riverway, Suite 1800
Houston, Texas 77056
Telephone: (713) 960-7315
Facsimile: (713) 960-7347

Jeffrey R. Parsons
Shareholder

Direct: (713) 960-7302
jparsons@pmcclaw.com

April 17, 2017

Sherry Griffis
Harrison County Courthouse
200 West Houston Suite 234
Marshall, Texas 75671
903-935-8409

Via Court's E-File System

Re: Cause No. _____; *Ironshore Europe, DAC v. Schiff Hardin, LLP; In the _____ District Court, Harrison County, Texas.*

Dear Ms. Griffis:

Enclosed please find *Plaintiff's Original Petition by Ironshore Europe, DAC*, e-filed today in the above-referenced matter. Please issue citation to Defendant Schiff Hardin, LLP and send the citation, together with a file-stamped copy of Plaintiff's Original Petition, to our process servicer via mail to:

Kim Tindall & Associates
Attn: Karen Tenrod
16414 San Pedro, Ste 900
San Antonio, TX 78232

Thank you for your assistance in this matter. If you have any questions, please do not hesitate to contact me.

Yours very truly,

/s/ Jeffrey R. Parsons

Jeffrey R. Parsons

JRP/lmk
Enclosures

Filed 4/17/2017 5:06:49 PM

Sherry Griffis

District Clerk

Harrison County, Texas

CIVIL PROCESS REQUEST FORM

FOR EACH PARTY SERVED YOU MUST FURNISH ONE (1) COPY OF THE PLEADING
FOR WRITS FURNISH TWO (2) COPIES OF THE PLEADING PER PARTY TO BE SERVED

Angie Hayes

CASE NUMBER: 17-0326

CURRENT COURT: Deputy

TYPE OF INSTRUMENT TO BE SERVED (See Reverse For Types): PLAINTIFF'S ORIGINAL PETITION

FILE DATE OF MOTION: _____

Month/ Day/ Year

SERVICE TO BE ISSUED ON (Please List Exactly As The Name Appears In The Pleading To Be Served):

1. NAME: SCHIFF HARDIN, LLP

ADDRESS: _____

AGENT, (if applicable): C/O Corporation Service Company d/b/a CSC-Lawyers Incorporating Service Company, 211 E. 7th Street,
Suite 620, Austin, TX 78701-3218

TYPE OF SERVICE/PROCESS TO BE ISSUED (see reverse for specific type): _____

SERVICE BY (check one):

☐ ATTORNEY PICK-UP☐ CONSTABLE☐ CIVIL PROCESS SERVER - Authorized Person to Pick-up: _____

Phone: _____

☐ MAIL☐ CERTIFIED MAIL☐ PUBLICATION:

Type of Publication:

☐ COURTHOUSE DOOR, or☐ NEWSPAPER OF YOUR CHOICE: _____☒ OTHER, explain via mail to Process Server: Kim Tindall & Associates, Attn: Karen Tenrod, 164414 San Pedro,

Ste. 900, San Antonio, TX 78232

ATTENTION: Effective June1, 2010

For all Services Provided by the DISTRICT CLERKS OFFICE requiring our office to MAIL something back to the
Requesting Party, we require that the Requesting Party provide a Self-Addressed Stamped Envelope with sufficient postage
for mail back. Thanks you,

2. NAME: _____

ADDRESS: _____

AGENT, (if applicable): _____

TYPE OF SERVICE/PROCESS TO BE ISSUED (see reverse for specific type): _____

SERVICE BY (check one):

☐ ATTORNEY PICK-UP☐ CONSTABLE☐ CIVIL PROCESS SERVER - Authorized Person to Pick-up: _____

Phone: _____

☐ MAIL☐ CERTIFIED MAIL☐ PUBLICATION:

Type of Publication:

☐ COURTHOUSE DOOR, or☐ NEWSPAPER OF YOUR CHOICE: _____☐ OTHER, explain _____

ATTORNEY (OR ATTORNEY'S AGENT) REQUESTING SERVICE:

NAME: JEFFREY R. PARSONS

TEXAS BAR NO./ID NO. 15547200

MAILING ADDRESS: One Riverway, Suite 1800, Houston, TX 77056

PHONE NUMBER: 713

960-7315

FAX NUMBER: 713 960-7347

area code

phone number

area code

fax number

EMAIL ADDRESS: jparsons@pmmclaw.com

SERVICE REQUESTS WHICH CANNOT BE PROCESSED BY THIS OFFICE WILL BE HELD FOR 30 DAYS PRIOR TO CANCELLATION. FEES WILL BE REFUNDED ONLY UPON REQUEST, OR AT THE DISPOSITION OF THE CASE. SERVICE REQUESTS MAY BE REINSTATED UPON APPROPRIATE ACTION BY THE PARTIES.

INSTRUMENTS TO BE SERVED:

(Fill In Instrument Sequence Number, i.e. 1st, 2nd, etc.)

ORIGINAL PETITION

_____ AMENDED PETITION
_____ SUPPLEMENTAL PETITION

COUNTERCLAIM

_____ AMENDED COUNTERCLAIM
_____ SUPPLEMENTAL COUNTERCLAIM

CROSS-ACTION:

_____ AMENDED CROSS-ACTION
_____ SUPPLEMENTAL CROSS-ACTION

THIRD-PARTY PETITION:

_____ AMENDED THIRD-PARTY PETITION
_____ SUPPLEMENTAL THIRD-PARTY PETITION

INTERVENTION:

_____ AMENDED INTERVENTION
_____ SUPPLEMENTAL INTERVENTION

INTERPLEADER

_____ AMENDED INTERPLEADER
_____ SUPPLEMENTAL INTERPLEADER

INJUNCTION

MOTION TO MODIFY

SHOW CAUSE ORDER

TEMPORARY RESTRAINING ORDER

BILL OF DISCOVERY:

ORDER TO: _____
(specify)

MOTION TO: _____
(specify)

PROCESS TYPES:

NON WRIT:

CITATION
ALIAS CITATION
PLURIES CITATION
SECRETARY OF STATE CITATION
COMMISSIONER OF INSURANCE
HIGHWAY COMMISSIONER
CITATION BY PUBLICATION
NOTICE
SHORT FORM NOTICE

PRECEPT (SHOW CAUSE)
RULE 106 SERVICE

SUBPOENA

WRITS:

ATTACHMENT (PROPERTY)
ATTACHMENT (WITNESS)
ATTACHMENT (PERSON)

CERTIORARI

EXECUTION
EXECUTION AND ORDER OF SALE

GARNISHMENT BEFORE JUDGMENT
GARNISHMENT AFTER JUDGMENT

HABEAS CORPUS
INJUNCTION
TEMPORARY RESTRAINING ORDER

PROTECTIVE ORDER (FAMILY CODE)
PROTECTIVE ORDER (CIVIL CODE)

POSSESSION (PERSON)
POSSESSION (PROPERTY)

SCIRE FACIAS
SEQUESTRATION
SUPERSEDEAS

Filed 4/17/2017 5:06:49 PM
Sherry Griffiths
District Clerk
Harrison County, Texas

Angie Hayes

Deputy

CAUSE NO. 17-0326

IRONSHORE EUROPE DAC	§	IN THE DISTRICT COURT
	§	
PLAINTIFF	§	71ST
	§	JUDICIAL DISTRICT
VS.	§	
	§	
SCHIFF HARDIN, LLP	§	
	§	
DEFENDANT	§	HARRISON COUNTY, TEXAS

PLAINTIFF'S ORIGINAL PETITION

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiff IRONSHORE EUROPE DAC, formerly known as Ironshore Europe Limited, ("Ironshore") files this Original Petition against Defendant SCHIFF HARDIN LLP ("Schiff") and as grounds respectfully shows the following:

DISCOVERY PLAN AND RULE 47 STATEMENT

Pursuant to Rule 190.4 of the Texas Rules of Civil Procedure, Ironshore states that discovery in this action should be in accordance with Discovery Control Plan Level 3. As required by Tex. R. Civ. P. 47, Ironshore states that: a) it asserts a cause of action against Schiff for negligent misrepresentation; b) the damages sought are within the jurisdictional limits of the court; c) Ironshore seeks monetary relief over \$1,000,000; and, d) Ironshore demands judgment for all other relief as requested below.

OVERVIEW

1. This is a case of negligent misrepresentations by Schiff, a large national law firm, to Ironshore, an Irish insurance company, regarding an underlying lawsuit (the "Underlying Lawsuit").

2. In November 2014, Ironshore issued a liability insurance policy (the "Ironshore Policy") to a product manufacturer (the "Underlying Defendant"). In May 2015, the Underlying Lawsuit was filed in Harrison County against the Underlying Defendant, who retained Schiff to defend the Underlying Lawsuit.

3. In the course of its business, Schiff reported to Ironshore but negligently misrepresented that the Underlying Lawsuit did not present exposure to Ironshore and the Ironshore Policy. Ironshore justifiably relied upon Schiff's negligent misrepresentations and incurred substantial actual damages, when Schiff's misrepresentations proved to be false and misleading.

4. In this action, Ironshore seeks to recover its actual damages proximately caused by Schiff's negligent misrepresentations and other relief summarized below.

PARTIES

5. Ironshore is an Irish insurance company, with its principal place of business in Dublin, Ireland.

6. Until recently, Schiff maintained an office in Texas. At all times relevant to this action, Schiff maintained an office in Texas and did business in Texas. Schiff continues to do business in Texas and maintains in Texas a registered agent for service of process. Schiff may be served with process in this action by serving citation upon its registered agent: Corporation Service Company d/b/a CSC-Lawyers Incorporating Service Company, 211 E. 7th Street, Suite 620, Austin, Texas 78701-3218

JURISDICTION AND VENUE

7. This Court has jurisdiction over all parties and all claims asserted by Ironshore herein. All claims are state law claims and Ironshore asserts no claim under federal law, rule or regulation. The amount in controversy is within the jurisdictional limits of this Court.

8. Venue is proper in Harrison County, Texas under Texas Civil Practice & Remedies Code, §15.002 (a)(1) because a substantial part of the events and omissions giving rise to this action occurred in this county.

BACKGROUND FACTS

9. Schiff is a large national law firm with offices throughout the United States.

10. In November 2014, Ironshore issued the Ironshore Policy of liability insurance to the Underlying Defendant.

11. In May 2015, the mother of an injured minor child (the “Underlying Plaintiffs”) filed the Underlying Lawsuit against the Underlying Defendant, alleging that the defendant failed to warn that its product was unreasonably dangerous, that the child was severely injured, and that Underlying Plaintiffs sought to recover damages for all their losses.

12. The Underlying Defendant hired Schiff to defend and represent it in connection with the Underlying Lawsuit. In 2015 and for most of 2016, Schiff proceeded to litigate the Lawsuit in this county.

13. In the course of Schiff’s business, Schiff reported upon the Underlying Lawsuit to Ironshore and its claim manager located in London, England. Under Texas law, Schiff had the duty to use reasonable care in making such representations, reporting the whole truth without material omission. Schiff breached its duty.

14. Under the Ironshore Policy, the Insured had a large “Self-Insured Retention,” meaning that an adverse judgment or settlement within the Self-Insured Retention would be the Insured’s sole responsibility. Conversely, an adverse judgment or settlement above the Self-Insured Retention would present exposure to Ironshore and the Ironshore Policy.

15. While Ironshore had no obligation to defend the Underlying Defendant under the Ironshore Policy, the policy expressly provided that:

[Ironshore] shall have the right and shall be given the opportunity to associate with the Insured . . . both in the defense and control of any Claim, suit or proceeding relative to any Occurrence where the Claim or suit involves, or appears reasonably likely to involve [Ironshore], in which event the Insured and [Ironshore] shall cooperate in all things in the defense of such Claim, suit or proceeding.

16. Ironshore justifiably relied upon Schiff to use reasonable care to report the whole truth, without material omission, concerning the Underlying Lawsuit - - so that Ironshore would be alerted if the Ironshore Policy was likely to be exposed and could then exercise its right to associate in the defense and control of the Underlying Lawsuit.

17. Beginning in October 2015, Schiff began its reporting to Ironshore. In the course of its reporting, Schiff negligently and falsely represented that the Underlying Lawsuit did not present exposure in excess of the Self-Insured Retention. Ironshore justifiably relied upon Schiff's reporting.

18. Yet, Schiff knew or should have known that the Underlying Lawsuit was extremely dangerous, that Schiff was recklessly gambling with the Ironshore Policy, and that Schiff's defense was heading toward shipwreck.

19. In March 2016, before a mediation of the Underlying Lawsuit, Schiff again misrepresented that the Lawsuit would not impact Ironshore's layer of insurance and made other misrepresentations concerning the Underlying Lawsuit.

20. In June 2016, with less than a week to trial, Schiff continued to provide favorable reports while omitting to disclose the true state of affairs. Remarkably, Schiff negligently failed to disclose an Order issued by the Court and devastating to Schiff's defense. The Order not only

denied Schiff's motion for summary judgment on punitive damages but also presaged the verdict that the jury would soon after return at trial:

[Plaintiff] has cited evidence that serious spinal cord injuries were foreseeable to and foreseen by [the Insured] and a reasonable jury could conclude that this constituted an 'extreme degree of risk'. In sum, [Plaintiff] has cited specific and sufficient evidence such that at trial a reasonable jury could find by clear and convincing evidence that [the Insured] was grossly negligent.

21. Schiff also failed to disclose to Ironshore other damaging orders. By separate orders the Court denied Schiff's motion to exclude expert testimony and evidence that the minor plaintiff had suffered a traumatic brain injury and denied Schiff's motion to exclude evidence of post-accident conduct.

22. The Underlying Lawsuit proceeded to trial, and the jury rendered a multi-million dollar verdict against the Underlying Defendant, not only in excess of its Self-Insured Retention but also in excess of Ironshore's Policy Limits. To avoid a disastrous final judgment, the Underlying Insured was compelled to enter into a very large settlement with the Underlying Plaintiffs, and Ironshore was compelled to fund the vast majority of the settlement.

23. After trial, Ironshore learned that Schiff's failure to disclose information to Ironshore ran even deeper. Remarkably, before trial Schiff had received a settlement offer within the Self-Insured Retention, but in conscious disregard of Ironshore's rights and welfare, Schiff did not disclose the offer to Ironshore.

24. Had Schiff timely reported to Ironshore the true state of affairs, Ironshore could and would have effected a pre-trial settlement well within the Self-Insured Retention. Instead, Schiff heedlessly and recklessly gambled with the Ironshore Policy limits and proximately caused great damage to Ironshore.

25. Schiff's misrepresentations were not merely negligent. They were grossly negligent. When viewed objectively from Schiff's standpoint, Schiff's false and misleading reporting, by commission and omission, involved an extreme degree of risk to Ironshore, considering the probability and magnitude of the potential harm to Ironshore. Despite Schiff's actual awareness of the risks involved, it provided false, misleading and omission laden reporting with conscious indifference to the rights and welfare of Ironshore. Accordingly, Ironshore seeks to recover an award of exemplary damages against Schiff, in an amount equal to two times the economic damages sustained by Ironshore.

CAUSES OF ACTION AND CLAIMS FOR RELIEF

26. Ironshore hereby incorporates the matters previously asserted in paragraphs 1 through 26.

27. **Cause of Action for Negligent Misrepresentation.** Ironshore hereby asserts a negligent misrepresentation cause of action against Schiff.

28. Ironshore will show that:

- a) Schiff made misrepresentations to Ironshore in the course of Schiff's business;
- b) Schiff's misrepresentations supplied false information for the guidance of Ironshore;
- c) Schiff did not exercise reasonable care in communicating the information to Ironshore;
- d) Ironshore justifiably relied on Schiff's misrepresentations; and,
- e) Schiff's negligent misrepresentations proximately caused actual damages to Ironshore.

29. **Gross Negligence and Exemplary Damages.** Further, Ironshore will show that Schiff was grossly negligent, entitling Ironshore to recover exemplary damages up to twice the amount of Ironshore's economic damages.

30. **Relief Requested.** Accordingly, in this action Ironshore seeks to recover a judgment against Schiff awarding Ironshore all of its actual damages, exemplary damages up to twice the

economic losses of Ironshore, pre-judgment and post-judgment interest at the legal rate, and all other and further relief as may be just and necessary.

JURY DEMAND

31. Ironshore requests a trial by jury, and it has timely paid the required jury fee.

REQUEST FOR DISCLOSURE

32. Pursuant to Rule 194 of the Texas Rules of Civil Procedure, Ironshore requests that within fifty (50) days of service of this request, Schiff make the required disclosures of all information and materials described in Rule 194.2 (a)-(l) of the Texas Rules of Civil Procedure.

DEMAND FOR RELIEF AND JUDGMENT

WHEREFORE, PREMISES CONSIDERED, Ironshore prays that citation be issued requiring Schiff to appear and answer herein, that this cause be set down for trial before a jury, that Ironshore recover judgment against Schiff for actual damages, exemplary damages, prejudgment and post judgment interest permitted by law, costs of court, and any other and further relief to which Ironshore may be justly entitled.

Respectfully submitted,

PARSONS MCENTIRE MCCLEARY & CLARK PLLC

/s/ Sawnie A. McEntire

Sawnie A. McEntire

State Bar No.13590100

smcentire@pmmclaw.com

1700 Pacific Avenue, Suite 4400

Dallas, TX 75201

Telephone: (214) 237-4300

Facsimile: (214) 237-4340

AND

Jeffrey R. Parsons
State Bar No. 15547200
jparsons@pmmclaw.com

Angela R. Webster
State Bar No. 24066009
awebster@pmmclaw.com

One Riverway, Suite 1800
Houston, TX 77056
Telephone: (713) 960-7315
Facsimile: (713) 960-7347

**ATTORNEYS FOR PLAINTIFF,
IRONSHORE EUROPE DAC**

CAUSE NO: 17-0326

COPYIN THE 71ST JUDICIAL DISTRICT COURT
OF HARRISON COUNTY, TEXAS

IRONSHORE EUROPE DAC

VS

SCHIFF HARDIN, LLP

CITATION

TO: THE SHERIFF OR ANY CONSTABLE OF TEXAS
OR ANY OTHER AUTHORIZED PERSONTHE STATE OF TEXAS
COUNTY OF HARRISONSCHIFF HARDIN, LLP; REGISTERED AGENT
CORPORATION SERVICE COMPANY D/B/A
CSC-LAWYERS INCORPORATING SERVICE CO.
211 E. 7TH STREET, SUITE 620
AUSTIN, TEXAS 78701-3218
OR WHEREVER HE/SHE MAYBE FOUNDAttached is a copy of **PLAINTIFF'S ORIGINAL PETITION**. This instrument was filed on **17TH DAY APRIL, 2017**, in the above cited cause number and court. The instrument attached describes the claim against you.

You have been sued. You may employ an attorney. If you or your attorney does not file a written answer with the District Clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you.

TO OFFICER SERVING.

This citation is issued on this **18TH DAY OF APRIL 2017**, under my hand and seal of said Court.

SEAL

Sherry Griffis
Harrison County, Texas
Harrison County Courthouse
200 W. Houston St., Suite 234
Marshall, Texas 75670BY *Angie Hayes*Issued at the request of
JEFFREY R. PARSONS
ONE RIVERWAY, STE. 1800
HOUSTON, TEXAS 77056

OFFICER/AUTHORIZED PERSON RETURN

Came to hand at _____ o'clock __.m., on the _____ day of _____, 20__.

Executed at _____ in _____ County at _____ o'clock __.m.

on the _____ day of _____, 20__, by delivering to _____
defendant, in person, a true copy of this citation together with the accompanying copy of the petition
attached thereto and I endorsed on said copy of the citation the date of delivery.

To certify which I affix my hand officially this _____ day of _____, 20__.

Fee \$ _____

_____ of _____ County, Texas

by _____ deputy Affiant

On this day, _____, known to me to be the person whose signature appears on the foregoing
return, personally appeared. After being duly sworn, he/she stated that this citation was executed by him/her in the exact
manner recited on the return.

SWORN TO AND SUBSCRIBED BEFORE ME ON _____, 20__.

ORIGINAL

CAUSE NO. 17-0326

Filed 4/26/2017 3:57:35 PM

Sherry Griffis
District Clerk
Harrison County, TexasIN THE 71ST JUDICIAL DISTRICT COURT
OF HARRISON COUNTY, TEXAS

Angie Hayes

Deputy

IRONSHORE EUROPE DAC

VS

SCHIFF HARDIN, LLP

CITATIONTO: THE SHERIFF OR ANY CONSTABLE OF TEXAS
OR ANY OTHER AUTHORIZED PERSONTHE STATE OF TEXAS
COUNTY OF HARRISONSCHIFF HARDIN, LLP; REGISTERED AGENT
CORPORATION SERVICE COMPANY D/B/A
CSC-LAWYERS INCORPORATING SERVICE CO.
211 E. 7TH STREET, SUITE 620
AUSTIN, TEXAS 78701-3218
OR WHEREVER HE/SHE MAYBE FOUND.**AFFIDAVIT
ATTACHED**Attached is a copy of **PLAINTIFF'S ORIGINAL PETITION**. This instrument was filed on 17TH DAY APRIL, 2017, in the above cited cause number and court. The instrument attached describes the claim against you.

You have been sued. You may employ an attorney. If you or your attorney does not file a written answer with the District Clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you.

TO OFFICER SERVING.This citation is issued on this 18TH DAY OF APRIL 2017, under my hand and seal of said Court.

SEAL

**AFFIDAVIT
ATTACHED**Sherry Griffis
Harrison County, Texas
Harrison County Courthouse
200 W. Houston St., Suite 234
Marshall, Texas 75670

BY

*Angie Hayes*Issued at the request of
JEFFREY R. PARSONS
ONE RIVERWAY, STE. 1800
HOUSTON, TEXAS 77056**OFFICER/AUTHORIZED PERSON RETURN**

Came to hand at _____ o'clock ____m., on the _____ day of _____, 20__.

Executed at _____ in _____ County at _____ o'clock ____m.
on the _____ day of _____, 20__, by delivering to _____

defendant, in person, a true copy of this citation together with the accompanying copy of the petition attached thereto and I endorsed on said copy of the citation the date of delivery.

To certify which I affix my hand officially this _____ day of _____, 20__.

Fee \$ 130.00

_____ of _____ County, Texas

by _____ deputy Affiant

On this day, _____, known to me to be the person whose signature appears on the foregoing return, personally appeared. After being duly sworn, he/she stated that this citation was executed by him/her in the exact manner recited on the return.

SWORN TO AND SUBSCRIBED BEFORE ME ON _____, 20__.

AFFIDAVIT OF SERVICE

State of Texas

County of Harrison

71st Judicial District Court

Case Number: 17-0326

Plaintiff:
Ironshore Europe DAC

vs.

Defendant:
Schiff Hardin, LLP

For:
Parsons McEntire McCleary & Clark, PLLC
1300 Post Oak Blvd.
24th Floor
Houston, TX 70056

Received by Kim Tindall & Associates, Inc. on the 24th day of April, 2017 at 11:48 am to be served on **Schiff Hardin, LLP** by serving its registered agent, **Corporation Service Company, 211 E. 7th Street, Ste. 620, Austin, TX 78701.**

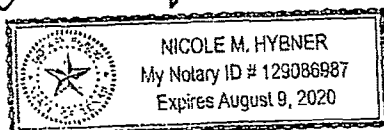
I, Tim Ramsey, being duly sworn, depose and say that on the **24th day of April, 2017 at 3:04 pm, I:**


delivered to **REGISTERED AGENT** by delivering a true copy of the **Citation and Plaintiff's Original Petition; Plaintiff Ironshore's Requests for Admissions and Interrogatories to Defendant Schiff Hardin, LLP; and Plaintiff Ironshore's Requests for Production of Documents to Defendant, Schiff Hardin, LLP** with the date of service endorsed thereon by me, to: **Van Tracy, Corporation Service Company as Authorized Agent at the address of: 211 E. 7th Street, Ste. 620, Austin, TX 78701** on behalf of **Schiff Hardin, LLP**, and informed said person of the contents therein, in compliance with state statutes.

I certify that I am over the age of 18, of sound mind, have no interest in the above action, and am a Certified Process Server, in good standing, in the judicial circuit in which the process was delivered. The facts stated in this affidavit are within my personal knowledge and are true and correct.

Subscribed and Sworn to before me on the 24th day of April, 2017 by the affiant who is personally known to me.

NOTARY PUBLIC




Tim Ramsey
SCH-11266, Exp 12/31/17

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Our Job Serial Number: MST-2017003518
Ref: Ironshore Europe DAC